

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

FOUNDATION AGAINST
INTOLERANCE & RACISM, INC.,

Plaintiff,

v.

Case No. 1:24-cv-115
Judge Thomas Kleeh

MARY JANE PICKENS, in her official
capacity as Executive Director of the West
Virginia State Bar; SHANNON SMITH, in
her official capacity as President of the West
Virginia State Bar Board of Governors;
DAVID AMSBARY, in his official capacity
as President-Elect of the West Virginia State
Bar Board of Governors,

Defendants.

**STIPULATION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' RENEWED MOTION TO DISMISS AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules of Civil Procedure 7.01 and 7.02(b)(4), Plaintiff, Foundation Against Intolerance & Racism, Inc., and Defendants stipulate that, for good cause, the deadline for Plaintiff to respond to Defendants' Renewed Motion to Dismiss Amended Complaint shall be extended by two weeks to May 13, 2025.

Respectfully submitted this 18th _____ day of April 2025.

s/ Martin P. Sheehan

Martin P. Sheehan (WVSB #4812)
Sheehan and Associates, PLLC
1140 Main St Suite 333
Wheeling, West Virginia 26003
Telephone: (304) 232-1064
martin@msheehanlaw.net

Joshua P. Thompson (Pro Hac Vice)
Caleb R. Trotter (Pro Hac Vice)
Pacific Legal Foundation
555 Capitol Mall, Suite 12930
Sacramento, CA 95814
Telephone: (916) 419-7111
JThompson@pacificlegal.org
CTrotter@pacificlegal.org

Samantha R. Romero (Pro Hac Vice)
3100 Clarendon Blvd., Suite 1000
Arlington, VA 22201
Telephone: (202) 888-6881
SRomero@pacificlegal.org

Counsel for Plaintiff
Foundation Against Intolerance
& Racism

/s/ Shawn A. Morgan

Shawn A. Morgan, Esq. (WVSB #6640)

Chase Riggs (WVSB #14678)
STEPTOE & JOHNSON PLLC
400 White Oaks Boulevard
Bridgeport, West Virginia 26330
304-933-8000 - telephone
304-933-8183 – facsimile
shawn.morgan@steptoe-johnson.com
chase.riggs@steptoe-johnson.com

Thomas J. Hurney, Jr., Esq. (WVSB #1833)
Caroline G. Massie, Esq. (WVSB #14651)
JACKSON KELLY, PLLC
P.O. Box 553
Charleston, West Virginia 25322-0553
(304) 340-1000 – telephone
(304) 340-1050 – facsimile
thurney@jacksonkelly.com
caroline.massie@jacksonkelly.com

Kevin J. Robinson, Esq. (WVSB #10181)
PULLIN FOWLER FLANAGAN BROWN
& POE, PLLC
252 George Street
Beckley, West Virginia 25801
(304) 254-9300 – telephone
(304) 255-5519 – facsimile
krobinson@pffwv.com

Marc E. Williams, Esq. (WVSB #4062)
Shaina D. Massie, Esq. (WVSB #13018)
Anna J. Williams, Esq. (WVSB #14705)
NELSON MULLINS RILEY &
SCARBOROUGH LLP
949 Third Ave.
Suite 200
Huntington, WV 2570
(304) 526-3500 – telephone
(304) 526-3599 – facsimile
marc.williams@nelsonmullins.com
shaina.massie@nelsonmullins.com
anna.williams@nelsonmullins.com

Counsel for Defendants Mary Jane
Pickens, Shannon Smith and David Amsbary

CERTIFICATE OF SERVICE

I hereby certify that on April 18th____, 2025, I electronically filed the foregoing with the Clerk of the U.S. District Court for the Northern District of West Virginia using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Martin P. Sheehan